



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

June 24, 2009

Ms. Rebecca L. Harriet
Superintendent
Harpers Ferry National Historical Park
National Park Service
P.O. Box 65
Harpers Ferry, West Virginia 25425

Re: Harpers Ferry National Historical Park Draft General Management Plan/Environmental Impact Statement, Harpers Ferry, West Virginia (CEQ Number: 20090132)

Dear Ms. Harriet:

In accordance with National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1508), the U.S. Environmental Protection Agency (EPA) has reviewed the Draft General Management Plan/Environmental Impact Statement for the Harpers Ferry National Historical Park in Harpers Ferry, WV.

The purpose and need of the proposed action is to provide a plan to manage Harpers Ferry National Historical Park for the next 15 to 20 years. The last park-wide planning effort was a general management plan/development concept plan completed in 1980. Since then, the park has experienced changes in patterns and types of visitor use as well as expanding the boundary of the park to include new resources.

The Draft Environmental Impact Statement (DEIS) examines three alternatives for managing Harpers Ferry National Historical Park for the next 20 years; they are: Alternative 1 (No Action), Alternative 2 (the Preferred Alternative), and Alternative 3.

Alternative 2, the Preferred Alternative, would provide enhanced educational and recreational opportunities for visitors and an expanded bus service increasing visitation to all areas of the national historical park. Each location in the national historical park would be managed and interpreted to reflect the most significant period associated with it. Management activities would focus on the preservation of the resources as well as the presentation of the interpretive themes appropriate to each location. The route of the National Park Service (NPS) transportation system (the Park Explorer) would be expanded and shuttle visitors from the visitor center directly to the NPS site(s) they wish to visit, including parts of the Civil War battlefield and Camp Hill. Visitors would receive a better understanding of certain events through auto tour and/or a trail system developed to connect outlying portions of the national historical park.

Alternative 3 is similar to Alternative 2 in that each location in the national historical park would be managed and interpreted to reflect the most significant period associated with it. Some structures, facilities, and agricultural lands would be leased to non-NPS entities to ensure their continued use and upkeep and to lessen the financial burden on the federal government. Visitors would be offered a greater diversity of experience and program opportunities, some of which could be provided through fee-based commercial enterprises. The transportation system would be operated in partnership with Main Street Harpers Ferry and expanded to incorporate stops in Harpers Ferry and possibly Boliver. A round-the-national-historical-park trail would be developed with connections to regional trails.

EPA supports the purpose and need for the proposed action and the preferred alternative. As a result of our review of the DEIS, EPA has assigned this DEIS a rating LO-1 (Lack of Objection/Adequate information) which indicates that we have no objection to the proposed action and that the DEIS adequately sets forth the environmental impacts of the preferred alternative. However, EPA requests additional information on specific actions proposed to better understand its impact. These comments are provided in the attachment.

Thank you for providing EPA with the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,



Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs



Attachment

Wetlands/Water Resources

- Page 73 states, "A pedestrian bridge to finish the Cavalier Heights to Lower Town trail would be constructed adjacent to the Shoreline Drive Bridge." Will the pedestrian bridge be attached to the Shoreline Drive Bridge or will there be a new bridge constructed? If so, describe the size of the bridge and its general design. In particular, discuss, if any, impacts to the natural environment (wetlands/water resources) that may be caused by the bridge. It is also suggested that the proposed action be depicted on the map of Alternative 2—Preferred Alternative.

Vegetation

- Page 73 states, "The purpose of this program would be to rewater the canal to appear as it did during the historic industrial period." "This could include actions such as removing vegetation from the canal prism, repointing, and replacing stone work and/or iron parts." Describe the existing conditions of the canal including size and type of vegetation to be removed.

- Page 193 states that, "...there would be continuation of some vegetative manipulation such as clearing or trimming in certain areas on Maryland Heights, Bolivar Heights, Schoolhouse Ridge, and the Murphy farm in order to maintain historic or scenic vistas." Describe and quantify the type of vegetation to be cleared.

Energy Conservation

- Since the NPS intends to expand the Park Explorer and shuttle visitors from the visitor center to NPS site(s) within Alternative 2 (the Preferred Alternative), EPA suggests that if additional vehicles are needed to consider electric/hybrid vehicles to conserve energy. It is also suggested that the NPS promote use of its own transportation system versus individual auto tours in the interest of energy conservation.



